

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

TIMOTHY ASPAN, JR., individually and on)
behalf of the class defined herein,)
)
Plaintiff,)
) Case No.: 08 CV 2826
v.)
) Judge Hart
HUDSON & KEYSE, LLC,)
)
Defendant.)
)

AGREED MOTION FOR AN ENLARGEMENT OF TIME

Defendant, Hudson & Keyse, LLC ("Hudson") by and through its attorneys, David M. Schultz and Corinne C. Heggie pursuant to Rule 6 and for its Agreed Motion for an Enlargement of Time to file its responsive pleading to plaintiff's Complaint, states as follows:

1. On or about May 15, 2008, plaintiff filed a class action Complaint against defendant alleging that defendant violated the Fair Debt Collection Practices Act, ("FDCPA").
2. Defendant has moved for two enlargements previously. Defendant's responsive pleading is due July 23, 2008.
3. Defendant requests an additional 14 days to file its responsive pleading.
4. Defendant and its counsel have used this time to investigate the allegations of Plaintiff's Complaint and to determine whether settlement of Plaintiff's claims on a class basis is appropriate. This has required the input of several people at defendant's office.
5. Defendant is seeking additional time to complete its investigation and potentially negotiate settlement of this matter.
6. On July 21, 2008, defense counsel discussed the additional time with counsel for the plaintiff. Counsel for the plaintiff has no objection to the relief sought herein.

7. This time is not meant for the purpose of unnecessary delay and will not prejudice any party to the litigation.

WHEREFORE, Defendant, Hudson & Keyse, LLC, respectfully, requests that this Court grant it an additional 14 days, up to and including August 6, 2008, to file its responsive pleading to plaintiff's Complaint.

Respectfully Submitted,

s/ Corinne C. Heggie
One of the attorneys for Defendant,
Hudson &Keyse, LLC

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